

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK**

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**NOTICE OF MOTION TO EXPEDITE HEARING ON MOTION FOR LEAVE
TO TAKE THE DEPOSITION OF THE BUFFALO POLICE BENEVOLENT
ASSOCIATION**

PLEASE TAKE NOTICE that Plaintiffs, by and through their undersigned attorneys, hereby move pursuant to Local Rule 7(d)(1) to expedite consideration of their motion for leave to take the deposition of the Buffalo Police Benevolent Association.

PLEASE TAKE FURTHER NOTICE that, as set forth in the Declaration of Matthew Parham dated December 11, 2023, Plaintiffs seek to expedite the motion so that the subpoena for the additional deposition can be served before the close of fact discovery on January 4, 2024. Plaintiffs request that answering papers for the motion be due December 18, 2023, reply papers be due December 21, 2023, and the motion be made returnable thereafter on a date to be determined by the Court.

Dated: December 11 2023
Buffalo, New York

Respectfully Submitted,

/s/ Matthew A. Parham

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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2023, I filed the foregoing Notice of Motion to Expedite Hearing on Motion for Leave to Take the Deposition of the Buffalo Police Benevolent Association dated December 11, 2023, and the proposed order granting the motion, with the Clerk of the District Court using the CM/ECF system, which would then electronically notify all counsel registered through the CM/ECF system.

Dated: December 11, 2023
Buffalo, New York

/s/ Matthew A. Parham

Matthew A. Parham